

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	
Shayla N. Butler)	Bankruptcy No. 25 B 02227
)	Chapter 7
)	
Debtor(s))	Judge Jacqueline P. Cox
)	

To: See Attached List

NOTICE OF MOTION

PLEASE TAKE NOTICE that on **July 22, 2025**, at 1:00 p.m., I will appear before the Honorable Jacqueline P. Cox, or any judge sitting in that judge's place, **either** in courtroom 680 of the Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn Avenue, Chicago IL 60604, or electronically as described below, and present the attached **Motion to Avoid Lien**, a copy of which is herby served upon you.

Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.

To appear by Zoom using the internet, go to this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

To appear by Zoom using a telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

Meeting ID and password. The meeting ID for this hearing is 161 273 2896 – Passcode 778135. The meeting ID and further information can also be found on the judge's web page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

CERTIFICATE OF SERVICE

I, David P. Lloyd, an attorney, certify that I caused a copy of the foregoing Notice and Motion to be served on the parties listed on the attached service list by electronic notice where indicated, and by first class mail by depositing with the United States Postal Service, LaGrange, Illinois, postage prepaid, prior to 5:00 P.M., this 11th day of July, 2025.

/s/ David P. Lloyd

David P. Lloyd

Notice List

Shayla N. Butler

25 B 02227

Electronic Mail Notice List

The following is the list of **parties** who are currently on the list to receive email notice/service for this case.

- Adam G. Brief Ustpregion11.es.ecf@usdoj.gov
- Joel P Fonferko bkpleadingsNORTHERN@il.cslegal.com
- Jeffrey L. Gansberg jeffrey.l.gansberg@usdoj.gov
- Robyn K Kish rkish@kdaolaw.com
- David P Leibowitz dleibowitz@lodpl.com,
il64@ecfcbis.com;dl@trustesolutions.com;dl@trustesolutions.net;ECF@lodpl.com
- David P Leibowitz dleibowitz@lodpl.com,
ecf@lodpl.com;lawofficesofdavidpleibowitzllc@jubileebk.net
- David P Lloyd courtdocs@davidlloydllaw.com
- Nathan Lollis nathan@lollis-law.com
- Bryan E. Minier bryan.minier@lathropgpm.com,
maria.vargas@lathropgpm.com;sujei.lara@lathropgpm.com
- Sandy L Morris smorris@vablawfirm.com,
mnoriega@vablawfirm.com;docket@vablawfirm.com,svalentine@vablawfirm.com
- Susan Valentine svalentine@vablawfirm.com,
mnoriega@vablawfirm.com;docket@vablawfirm.com

BLC Prime Lending Fund II, LLC

c/o Nathan Lollis

72 S. LaGrange Rd., Suite 7

LaGrange IL 60525

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MOTION TO AVOID LIEN

NOW COMES Shayla N. Butler, the Debtor, by and through her attorney, David P. Lloyd, and moves this honorable Court to avoid the judgment lien of BLC Prime Lending Fund II, LLC, and in support thereof states as follows:

1. The Debtor commenced this case by filing a voluntary Chapter 7 petition on February 13, 2025.

2. The Debtor owns her home at 20173 Ash Lane, Lynwood, Illinois.

3. Among the creditors herein is BLC Prime Lending Fund II, LLC ("BLC").

2. BLC holds a judgment lien in the Debtor's residence. The lien arises from a judgment lien filed with the Cook County Recorder of Deeds on April 26, 2023, as Document No. 2311615012.

3. The value of the residence, as scheduled by the Debtor, was \$215,000 at the time of the filing of this case. A copy of the Debtor's Schedule A is attached hereto.

4. The Debtor's residence is subject to a first mortgage, scheduled in the amount of \$115,959, in favor of Roundpoint Mortgage. A copy of the Debtor's Schedule D is attached hereto.

5. The Debtor's residence is also subject to the following judgment liens, which are prior in time and right to BLC's lien:

(a) City of Chicago, filed 7/29/71 as Document No. 2120106107; Case No. 21 WD 00420A;

judgment amount \$1,765.87, entered 2/20/21; amount due at filing \$2,403.32;

(b) City of Chicago, filed 10/4/21 as Document No. 2127742039; Case No. 20 WD 02402A; judgment amount \$31,182.31, entered 11/4/20; amount due at filing \$43,115.31;

(c) Kapitus Services, Inc., filed 3/7/23 as Document No. 2306622046; Case No. 2023 L 050118; judgment amount \$91,772.50, entered 10/8/22; amount due at filing \$111,220.67.

6. The Debtor properly claimed a homestead exemption of \$15,000 in her residence. A copy of the Debtor's Schedule C is attached hereto.

7. The total of all prior liens and the Debtor's homestead exemption in her residence exceeds the value of the residence. The computation of the liens and homestead exemption is as follows:

Value:	\$215,000.00
Mortgage:	\$115,959.00
City of Chicago lien (1):	\$ 2,403.32
City of Chicago lien (2):	\$ 43,115.31
Kapitus Services lien:	\$111,220.67
Exemption:	\$ 15,000.00

NET VALUE: (\$72,698.30)

8. Pursuant to Section 522(f) of the Bankruptcy Code, the lien of the said creditor impairs the Debtor's exemptions and may be avoided.

WHEREFORE the Debtor prays that the judgment lien of BLC Prime Lending Fund II, LLC, be avoided, and for such other and further relief as this honorable Court may deem meet.

Respectfully submitted,
Shayla N. Butler

By: /s/ David P. Lloyd
One of her attorneys

David P. Lloyd, Ltd.
615B S. LaGrange Rd.
LaGrange IL 60525
708-937-1264
Fax: 708-937-1265